

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,
et al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**WHITEBOX FUNDS' INFORMATIVE MOTION
REGARDING THE JUNE 28-29 OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

Whitebox Asymmetric Partners, L.P., Whitebox Institutional Partners, L.P., Whitebox Multi-Strategy Partners, L.P., Pandora Select Partners, L.P., and Whitebox Term Credit Fund I L.P. (collectively, the “**Whitebox Funds**”), creditors and parties in interest in the above captioned Title III cases, respectfully submit this informative motion pursuant to the June 21, 2017 *Order Regarding Procedures for Attendance, Participation, and Observation of June 28-29, 2017 Omnibus Hearing* [Docket No. 403] (the “**Order**”).

In compliance with the Order the Whitebox Funds respectfully state that Daniel A. Fliman of Kasowitz Benson Torres LLP intends to speak at the June 28-29, 2017 omnibus

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number (listed as a bankruptcy case number due to software limitations) and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); and (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474).

hearing on behalf of the Whitebox Funds and will appear before the Court in the United States District Court for the District of Puerto Rico with respect to the following agenda items:

- a) Amended Agenda Item I.1. The Court's *Order and Notice of Preliminary Designation of Mediation Team Setting Deadline for Objections to Membership* [Docket No. 329];
- b) Amended Agenda Item III.3. The *Motion of the Debtors Pursuant to PROMESA Section 301(a) and Bankruptcy Code Sections 105(a), 362(a), 365 and 922 For Entry of Order Confirming (I) Application of the Automatic Stay to Government Officers, Agents and Representatives (II) Stay of Prepetition Lawsuits and Actions Against Inhabitants of Puerto Rico and (III) Application of Contract Protections* [Docket No. 302]; and
- c) Anything related to the Adversary Proceeding styled as *The Bank of New York Mellon, as Trustee v. Puerto Rico Sales Tax Financing Corporation ("COFINA")*, et al., Adv. Proc. No. 17-133-LTS (D.P.R.).

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 27th day of June, 2017.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record, and will provide hard copies to the Court and United States Trustee as soon as practical after the filing of the foregoing, consistent with the Court's June 6, 2017 First Amended Case Management Order. (*See* [Docket No. 262] § 2.I.)

**SALDAÑA, CARVAJAL & VÉLEZ-RIVÉ,
P.S.C.**

166 Avenida de la Constitución
San Juan, Puerto Rico 00901
Tel.: 787-289-9250
Fax: 787-289-9253

s/ Charles Bimbela-Quiñones

Charles Bimbela-Quiñones
USDC-PR No. 203414
E-mail: cbimbela@scvrlaw.com

s/ Melissa Hernández-Carrasquillo

Melissa Hernández-Carrasquillo
USDC-P.R. No. 230511
E-mail: mhernandez@scvrlaw.com

*Attorneys for Whitebox Asymmetric Partners,
L.P., Whitebox Institutional Partners, L.P.,
Whitebox Multi-Strategy Partners, L.P.,
Pandora Select Partners, L.P., and Whitebox
Term Credit Fund I L.P.*

KASOWITZ BENSON TORRES LLP

1633 Broadway
New York, NY 10019
Tel.: 212-506-1700
Fax: 212-506-1800

Kenneth R. David (*pro hac vice*)

E-mail: kdavid@kasowitz.com

Daniel A. Fliman (*pro hac vice*)

E-mail: dfliman@kasowitz.com

Ryan P. Montefusco (*pro hac forthcoming*)

E-mail: rmontefusco@kasowitz.com

Isaac S. Sasson (*pro hac vice*)

E-mail: isasson@kasowitz.com

*Attorneys for Whitebox Asymmetric Partners, L.P.,
Whitebox Institutional Partners, L.P., Whitebox
Multi-Strategy Partners, L.P., Pandora Select
Partners, L.P., and Whitebox Term Credit Fund I
L.P.*